

April 1, 2025

BY ECF

The Honorable John P. Cronan
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Doe v. Combs, et. al.*, Case No. 24-cv-08852 (JPC)

Dear Judge Cronan:

We write jointly on behalf of the Plaintiff in this action and defendants Sean Combs, Daddy's House Recordings Inc., CE OpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises, LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (the "Combs Defendants").

The undersigned parties respectfully request that the Court's previously ordered deadline to submit a case management plan, currently scheduled for April 4, 2025 be adjourned pending resolution of the Combs Defendants' motion to dismiss. *See* ECF #42.

All parties believe that it will be more efficient to defer discovery pending resolution of the motion to dismiss. If the motion is successful, it may result in complete dismissal of this action in its entirety or against certain defendants, which could significantly alter the scope of discovery that needs to be conducted.

Discovery in this matter is further complicated by the impending criminal trial of Defendant Sean Combs, which is scheduled to begin before Judge Subramanian on May 5, 2025. *See USA v. Combs*, Case No. 24-cr-00542 (S.D.N.Y.). The parties agree that it is impractical to proceed with various aspects of fact discovery involving Mr. Combs until this criminal trial is concluded. Deferring a case schedule pending the motions to dismiss will therefore have the added benefit of allowing time for the criminal matter to conclude.

Hon. John P. Cronan

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Page 2 of 2

Respectfully submitted,

/s/ Mark Cuccaro

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